

CARTER LEDYARD MILBURN

Alexander G. Malyshev

Partner
malyshev@clm.com

28 Liberty Street
New York, NY 10005
D / 212-238-8618

October 19, 2023

BY ECF

Hon. Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Gao et al. v. Singularity Future Technology Ltd. et al., Case No. 22-cv-7499

Dear Judge Cogan:

We represent Defendant Singularity Future Technology Ltd. F/K/A Sino-Global Shipping America Ltd. ("Singularity") and Zhikang Huang ("Z. Huang") in the above-referenced litigation. Defendants' deadline to respond to the Second Amended Complaint is currently October 20, 2023.

We write pursuant to Rule I(E) of the Court's individual rules of practice to request an extension of time to respond to the Second Amended Complaint and to propose a briefing schedule for all of the appearing defendants' anticipated motions to dismiss. We have conferred with counsel for the appearing co-defendants and for plaintiffs, and all such counsel of record join in this request. The parties propose the following briefing schedule:

1. Opening motion papers – by November 20, 2023
2. Opposition papers – by January 5, 2024
3. Reply papers – by January 26, 2024

This is the parties' first request for an extension of time to respond to the Second Amended Complaint. Defendants require additional time to fully brief the legal issues which will be raised in the motions to dismiss the Second Amended Complaint (which stands at 322 Paragraphs). Plaintiff requires until January 5, 2024, to oppose the anticipated motions due to the intervening holidays.

Accordingly, we respectfully request that the Court grant this request for an extension of time and so-order the parties' proposed briefing schedule.

Respectfully submitted,



Alexander G. Malyshev

cc: All Counsel of Record (via ECF)